

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA,

-v-

WALTER SHIMOON,  
*Defendant.*

No. 11 Cr. 32 (JSR)

**NOTICE OF MOTION**  
**TO MODIFY BAIL**  
**CONDITIONS**

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**PLEASE TAKE NOTICE THAT**, upon consent of the parties, Defendant WALTER SHIMOON hereby moves the Court for an Order modifying his bail conditions, as follows:

Authorizing Mr. Shimoon's travel to Ontario, Canada from September 29, 2012 to October 14, 2012. Mr. Shimoon seeks this travel to attend the wedding of his brother-in-law and also to visit with his father who is recovering from open heart surgery. Mr. Shimoon agrees to provide both Pretrial Services and the Government a complete itinerary and contact information in Canada during his trip. I earlier conferred with the Government regarding this request, and it has no objection to the proposed travel.

For the limited purpose of this request, Mr. Shimoon seeks further authorization to retrieve his travel documents, including his American and Canadian passports, from Pretrial Services prior to the date of his departure, and he will return them to his supervising Pretrial Services Officer in San Diego, California, on Monday, October 15, 2012.

A proposed Order to this effect is attached at Exhibit A hereto.

Dated: New York, New York  
September 21, 2012

Respectfully submitted,

By: /S/  
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